IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Susanne H. Linn and Melissa Knesz :

Plaintiffs

Civil Action

٧.

. No. 02-4417

Northampton County, et al.

:

Defendants:

DEFENDANTS' JOINT MOTION TO EXCLUDE ANY AND ALL EVIDENCE REGARDING OBSCENE COMMENTS OR CONDUCT BY INMATES WITH RESPECT TO PLAINTIFFS' TITLE VII AND PENNSYLVANIA HUMAN RELATIONS ACT CLAIMS

Defendants, Northampton County, Northampton County Department of Corrections, Warden Todd Buskirk and AFSCME Local 2549 move to exclude any and all evidence regarding obscene comments or conduct to support Plaintiffs' allegations of sexual discrimination. The grounds for this Motion and supporting law are set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted by,

WILLIG, WILLIAMS & DAVIDSON

MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP

LINDA M. MARTIN, ESQUIRE JOHN R. BIELSKI, ESQUIRE 1845 Walnut Street, 24th Floor Philadelphia, PA 19103 (Office) (215) 656-3665 (Facsimile) (215) 561-5135

Counsel for Defendant AFSCME, Local 2549

DAVID J. MacMAIN, ESQUIRE
L. KRISTEN BLANCHARD, ESQUIRE.
DENNIS G. YOUNG, JR., ESQUIRE
123 South Broad Street
Avenue of the Arts
Philadelphia, PA 19109
(Office) (215) 772-1500
(Facsimile) (215) 772-7620

Counsel for Northampton County, Northampton County Department of Prisons, and Warden Todd Buskirk

Dated: July 15, 2003